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6 THE PRUDENTIAL INSURANCE COMPANY OF
7 AMERICA

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 LORI HARRELSON,
12 Plaintiff,
13 v.
14 PRUDENTIAL INSURANCE COMPANY OF
15 AMERICA,
16 Defendant.

Case No. 2:23-cv-00648-JCM-BNW
**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO ANSWER
COMPLAINT**
(FIRST REQUEST)

18 Plaintiff Lori Harrelson (“Plaintiff”) and Defendant The Prudential Insurance Company of
19 America (“Prudential” or “Defendant”) (collectively, the “Parties”), hereby stipulate that Prudential
20 shall have a twenty-one (21) day extension of time to answer or otherwise respond to Plaintiff’s
21 Complaint. In support of their stipulation, the Parties state as follows:

22 1. Plaintiff filed her Complaint on April 25, 2023. (ECF No. 1.)
23 2. Prudential was served via the Nevada Division of Insurance on May 12, 2023 (ECF No.
24 4), and Prudential’s Answer is currently due on June 12, 2023 (including the extension granted by NRS
25 680A.260(3)).

26 3. Prudential is promptly collecting and reviewing the relevant file documents in order to
27 prepare a response to Plaintiff’s Complaint, but requests twenty-one (21) additional days, until and
28 including July 3, 2023, to complete its investigation and prepare its response.

1 4. On June 8, 2023, Counsel for Defendant conferred with Counsel for Plaintiff, who
2 indicated that Plaintiff does not object to or oppose Defendant's request for an extension.

3 5. This is Defendant's first request for an extension.

4 6. This stipulation is filed before the response to the Complaint is due and is filed in good
5 faith and not for the purpose of unwarranted delay.

6 WHEREFORE, the Parties request that the Court extend the deadline for Prudential to answer or
7 otherwise respond to Plaintiff's Complaint by twenty-one (21) days until and including July 3, 2023.

8 DATED: June 9, 2023

Respectfully submitted,

9 LAW OFFICE OF JULIE A. MERSCH

BAUMAN LOEWE WITT & MAXWELL, PLLC

11 By: s/ Julie A. Mersch

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LORI HARRELSON

By: s/ Michael C. Mills

Michael C. Mills
One of the attorneys for Defendant
THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA

18 IT IS SO ORDERED:

20 
U.S. Magistrate Judge

21 DATED: June 12, 2023

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he electronically filed and served the foregoing document with the Clerk of the United States District Court for the District of Nevada using the CM/ECF system on this 9th day of June, 2023, which sent notification of such filing to all counsel of record, including the following:

Julie A. Mersch, Esq.
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/s/ Michael C. Mills
Michael C. Mills